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7 *Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
11 Liability Litigation

12 SHERR-UNA BOOKER, an individual,
13 Plaintiff,

14 v.

15 C.R. BARD, INC., a New Jersey
16 corporation and BARD PERIPHERAL
17 VASCULAR, an Arizona corporation,
18 Defendants.

No. MD-15-02641-PHX-DGC

**PLAINTIFF'S NOTICE OF
LODGING EXHIBITS UNDER
SEAL REGARDING PLAINTIFF'S
RESPONSE TO DEFENDANTS'
MOTION FOR NEW TRIAL
PURSUANT TO RULE 59**

19 Pursuant to LRCiv 5.6(d), Plaintiff submits this Notice of Lodging Exhibit Under
20 Seal regarding Plaintiff's Response to Defendants' Motion For A New Trial Pursuant To
21 Rule 59.

22 Plaintiff provides notice that, pursuant to LRCiv 5.6(d), she has lodged with the
23 Court the documents listed on Exhibit A to this Notice.

24 Defendants contend that the documents listed in Exhibit A are confidential and
25 should be filed under seal as represented in Bard's May 7, 2018 Motion And
26 Memorandum in Support to Seal Certain Trial Exhibits [Doc. 11010]. Plaintiff does not
27
28

1 believe that the disputed documents warrant continued confidential treatment as
2 proprietary or sensitive trade secret information.

3 RESPECTFULLY SUBMITTED this 7th day of May, 2018.

4 GALLAGHER & KENNEDY, P.A.

5 By: /s/ Mark S. O'Connor

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14 *Counsel for Plaintiffs*

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on this 7th day of May 2018, I electronically transmitted the
17 attached document to the Clerk's Office using the CM/ECF System for filing and
18 transmittal of a Notice of Electronic Filing.

19 /s/ Gay Mennuti

EXHIBIT A

Ex. A.2, Mar. 28, 2018, Trial Tr., 2352:19-2352:24
Ex. E, Trial Ex. 5296
Ex. H, Trial Ex. 1221
Ex. I, Trial Ex. 2248
Ex. K, Trial Ex. 1295
Ex. L, Trial Ex. 6046
Ex. M, Trial Ex. 2252
Ex. N, Trial Ex. 1222
Ex. P, Trial Ex. 5290
Ex. Q, Trial Ex. 2052